

1 HANSON BRIDGETT LLP
KURT A. FRANKLIN, SBN 172715
2 kfranklin@hansonbridgett.com
LISA M. POOLEY, SBN 168737
3 lpooley@hansonbridgett.com
SAMANTHA WOLFF, SBN 240280
4 swolff@hansonbridgett.com
JENNIFER ANIKO FOLDVARY, SBN 292216
5 jfoldvary@hansonbridgett.com
425 Market Street, 26th Floor
6 San Francisco, California 94105
Telephone: (415) 777-3200
7 Facsimile: (415) 541-9366

8 HANSON BRIDGETT LLP
TYSON M. SHOWER, SBN 190375
9 tshower@hansonbridgett.com
LONDON D. BAILEY, SBN 240236
10 lbailey@hansonbridgett.com
500 Capitol Mall, Suite 1500
11 Sacramento, California 95814
Telephone: (916) 442-3333
12 Facsimile: (916) 442-2348

13 OTTEN LAW, PC
VICTOR OTTEN, SBN 165800
14 vic@ottenlawpc.com
KAVITA TEKCHANDANI, SBN 234873
15 kavita@ottenlawpc.com
3620 Pacific Coast Highway, #100
16 Torrance, California 90505
Telephone: (310) 378-8533
17 Facsimile: (310) 347-4225

18 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
19 REED, and COASTAL PROTECTION
RANGERS, INC.
20

21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
23

24 CORY SPENCER, an individual;
25 DIANA MILENA REED, an
individual; and COASTAL
26 PROTECTION RANGERS, INC., a
27 California non-profit public benefit
corporation,
28

CASE NO. 2:16-cv-02129-SJO (RAOx)

**DECLARATION OF SAMANTHA
WOLFF IN SUPPORT OF
PLAINTIFFS' REQUEST FOR
EXTENSION OF TIME**

Filed Concurrently with Plaintiffs'
Request for Extension of Time to

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Plaintiffs,

v.

LUNADA BAY BOYS; THE INDIVIDUAL MEMBERS OF THE LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT BLAKEMAN, ALAN JOHNSTON AKA JALIAN JOHNSTON, MICHAEL RAE PAPAYANS, ANGELO FERRARA, FRANK FERRARA, CHARLIE FERRARA, and N. F.; CITY OF PALOS VERDES ESTATES; CHIEF OF POLICE JEFF KEPLEY, in his representative capacity; and DOES 1-10,

Defendants.

Oppose Defendants' Motions for Summary Judgment

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

I, Samantha Wolff, declare as follows:

1. I am a partner at the law firm Hanson Bridgett, LLP, counsel of record for Plaintiffs Cory Spencer, Diana Milena Reed, and the Coastal Protection Rangers, Inc. (Plaintiffs). I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. At the request of each Defendant, counsel for Plaintiffs have met and conferred regarding Defendants' anticipated motions for summary judgment. Most recently, on July 14, 2017, I attended and telephonic meet and confer with counsel for Brant Blakeman, Angelo Ferrara, N.F., Michael Papayans, Alan Johnston, Frank Ferrara, and Charlie Ferrara. At that time, I indicated that Plaintiffs would be requesting a full 14 days to oppose Defendants' motions, rather than the 7 days they are presently afforded

1 under the local rules. Defense counsel who were present stated that they
2 were generally amenable to this request, though at least counsel for
3 Defendant Blakeman indicated he would like to run it by his client.

4 3. On July 18, 2017, I emailed all counsel in this matter and
5 attached a proposed stipulation which would afford Plaintiffs an additional 7
6 days to oppose Defendants' motions. I received a response, from counsel
7 for Defendants N.F. and Angelo Ferrara, who proposed several edits.
8 Counsel for Defendant Papayans also responded and indicated that he is
9 not opposed to Plaintiffs' request for an additional 7 days.

10 4. Plaintiffs have actively pursued discovery in this matter, and
11 have been engaged in discovery disputes from a number of Defendants.
12 Indeed, as recently as July 13, 2017, Magistrate Judge Oliver ordered
13 Defendants Frank Ferrara and Charlie Ferrara to produce responsive
14 documents by July 17, 2017. A further hearing has been set for July 25,
15 2017 to address this ongoing dispute. Similarly, Plaintiffs are involved in a
16 discovery dispute with Defendant Sang Lee and this matter will also be
17 heard on July 25, 2017.

18 5. Plaintiffs also anticipate receiving responsive documents from
19 Defendants Papayans, N.F., and Angelo Ferrara in the very near future.
20 See Dkt. No. 265 (Stipulation and Order requiring the Los Angeles Police
21 Department to release the cell phone of Defendant Papayans for forensic
22 extraction, review and production).

23 6. This request is not being made for any improper purpose, and
24 Plaintiffs are not seeking to unreasonably delay resolution of this matter.
25 Nor will this request prejudice any party. Plaintiffs have not previously been
26 granted an extension of time with respect to any of the Court's deadlines in
27 this matter.

28 ///

1 I declare under penalty of perjury of the laws of the United States of
2 America that the foregoing is true and correct. Executed in Walnut Creek,
3 California on July 24, 2017.

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Samantha D. Wolff
Samantha Wolff